

# Exhibit B

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**From:** James M. Jimmerson, Esq. <jmj@jimmersonlawfirm.com>  
**Sent:** Tuesday, November 15, 2022 5:53 PM  
**To:** Mestre, Michael S.  
**Subject:** Re: Cash Cloud Inc.  
**Attachments:** image001.png; BOA (SC) BORDEN - 2022 10 11 Summons and Complaint(166251378.1).pdf

**\*\*EXTERNAL EMAIL; use caution with links and attachments\*\***

Michael,

You have Cash Cloud Inc. s consent to remove the action to federal court. If you have any questions or concerns, please let me know.

Sincerely,

James M. Jimmerson, Esq.  
Senior Associate  
The Jimmerson Law Firm, P.C.  
[415 South 6th Street, Suite 100](#)  
[Las Vegas, Nevada 89101](#)  
[\(702\) 388-7171](#) (Office)  
[\(702\) 380-6413](#) (Facsimile)  
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On Nov 15, 2022, at 8:35 AM, Mestre, Michael S. <mmestre@mcguirewoods.com> wrote:

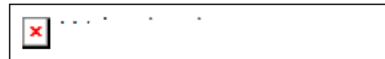
Hey James,

Please see the attached summons and complaint received in the matter. If Cash Cloud consents to removal please let me know as soon as possible as the deadline for BANA to remove the matter is tomorrow November 16, 2022.

Thank you,

**Michael S. Mestre**  
Attorney  
McGuireWoods LLP  
201 North Tryon Street  
Suite 3000

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**From:** James M. Jimmerson, Esq. <jmj@jimmersonlawfirm.com>  
**Sent:** Tuesday, November 15, 2022 11:23 AM  
**To:** Mestre, Michael S. <mmestre@mcguirewoods.com>  
**Subject:** Cash Cloud Inc.

**\*\*EXTERNAL EMAIL; use caution with links and attachments\*\***

Mr. Mestre,

I just left you a voicemail at your office and on your cell. This firm represents Cash Cloud Inc. and I am reaching out to you concerning your email from last Friday involving a lawsuit against your client Bank of America and Cash Cloud Inc. (among others). Please give me a call when you get a chance. The easiest number to reach me is on my cell at (702) 606-5439. Thanks.

Sincerely,

James M. Jimmerson, Esq.  
Senior Associate  
The Jimmerson Law Firm, P.C.  
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Las Vegas, Nevada 89101  
(702) 388-7171 (Office)  
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**From:** Marwan Sanoufi <ms@pinlegal.com>  
**Sent:** Monday, November 14, 2022 11:46 PM  
**To:** Mestre, Michael S.  
**Cc:** Vincent Renda, Esq.  
**Subject:** Re: Christine Borden v. BANA et. al./

**\*\*EXTERNAL EMAIL; use caution with links and attachments\*\***

Good Evening Michael,

Please disregard my last email. If you are still able to, please include in BANA s filing that Westcliff consents to the removal of this matter to federal court pursuant to 28 U.S.C. § 1446.

Thank you!

Sincerely,

Marwan Sanoufi, Esq. ~ Pinnacle Legal P.C.  
9565 Waples Street, Suite #200, San Diego, CA 92121  
O: 858-868-5000 / Fax: 866-303-8383  
[ms@pinlegal.com](mailto:ms@pinlegal.com)

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**From:** Marwan Sanoufi <ms@pinlegal.com>  
**Date:** Monday, November 14, 2022 at 11:57 AM  
**To:** "Mestre, Michael S." <mmestre@mcguirewoods.com>  
**Cc:** "Vincent Renda, Esq." <vr@pinlegal.com>  
**Subject:** RE: Christine Borden v. BANA et. al./

Hi Michael,

In that case, please proceed with noting the quoted language in a footnote for now while we await response from opposing counsel. If no luck in obtaining an early dismissal, we will follow suit.

Thank you.

Sincerely,

Marwan Sanoufi, Esq. ~ Pinnacle Legal P.C.  
9565 Waples Street, Suite #200, San Diego, CA 92121  
O: 858-868-5000 / F: 866-303-8383

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**From:** Mestre, Michael S. <mmestre@mcguirewoods.com>  
**Sent:** Monday, November 14, 2022 11:26 AM  
**To:** Marwan Sanoufi <ms@pinlegal.com>

Cc: Vincent Renda, Esq. <vr@pinlegal.com>  
Subject: RE: Christine Borden v. BANA et. al./

Hello Marwan,

Thank you for touching base with me on the matter. Unfortunately, BANA received service of the complaint on October 17, 2022 making our deadline to remove the matter to federal court this Wednesday 11/16/2022 pursuant to 28 U.S.C. § 1446. We had planned on removing the matter and in the footnote stating something to the effect it does not appear Defendants Westcliff and Coin Cloud have been properly served and as such time for either party to provide consent to removal has not passed.

If you are able to touch base with local counsel on the matter and do in fact consent to the removal, please let me know as soon as possible and we will note in the removal Westcliff's consent to the removal.

Thank you,

**Michael S. Mestre**

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From: Marwan Sanoufi <[ms@pinlegal.com](mailto:ms@pinlegal.com)>  
Sent: Monday, November 14, 2022 2:10 PM  
To: Mestre, Michael S. <[mmestre@mcguirewoods.com](mailto:mmestre@mcguirewoods.com)>  
Cc: Vincent Renda, Esq. <[vr@pinlegal.com](mailto:vr@pinlegal.com)>  
Subject: RE: Christine Borden v. BANA et. al./

**\*\*EXTERNAL EMAIL; use caution with links and attachments\*\***

Hello Mr. Mestre,

Thank you for your email. Our firm represents Westcliff as General Counsel on multiple matters within the State of California. We have received and reviewed the Complaint for the above-captioned case. While we have not appointed South Carolina counsel on the matter yet, we await Plaintiff counsel's response to Westcliff's demand to be dismissed from the case.

In the likely scenario that Westcliff continues to be a named defendant in this matter, Westcliff would not be opposed to removing this matter to Federal court. We expect to hear back from Borden's counsel by end of week, so I think it would be best if we plan to touch base on removal early next week.

Sincerely,

Marwan Sanoufi, Esq. ~ Pinnacle Legal P.C.  
9565 Waples Street, Suite #200, San Diego, CA 92121  
O: 858-868-5000 / F: 866-303-8383

----- Original message -----

From: "Mestre, Michael S." <[mmestre@mcguirewoods.com](mailto:mmestre@mcguirewoods.com)>  
Date: 11/11/22 9:21 AM (GMT-08:00)  
To: [compliance@westclifftech.com](mailto:compliance@westclifftech.com), [atia@westclifftech.com](mailto:atia@westclifftech.com)  
Subject: FW: Christine Borden v. BANA et. al./

Hello,

I represent Bank of America in a complaint filed against Bank of America, Westcliff Technologies Inc. d/b/a National Bitcoin ATM, and Cash Cloud Inc., d/b/a Coin Cloud. I want to get in touch with the appropriate party handling the matter from Westcliff Technologies to discuss removing the matter to federal court. If someone from Westcliff Technologies would please contact me at their earliest convenience I would appreciate it.

Thank you,

**Michael S. Mestre**

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